

EXHIBIT B

From: Allingham II, Thomas [TALLINGH@skadden.com]
Sent: Thursday, September 21, 2006 6:53 AM
To: Gosselin, Jason P.
Subject: Depositions

Jason:

Here is the list of persons we wish to depose on the Board prayer issue. I have included a 30(b)(6) witness, who would be designated as most knowledgeable on the topics set forth in the attachment.

- 1) Charles M. Bireley
- (2) Nina Lou Bunting
- (3) Susan S. Bunting
- (4) Richard H. Cohee
- (5) John M. Evans
- (6) Donald G. Hattier
- (7) Janet Hearn
- (8) Reginald L. Helms
- (9) Lois M. Hobbs
- (10) Randall Hughes
- (11) Mark A. Isaacs
- (12) Donna M. Mitchell
- (13) Harvey L. Walls
- (14) M. Elaine McCabe
- (15) Gregory A. Hastings
- (16) Robert Wilson
- (17) Patricia Oliphant
- (18) Dan Gaffney
- (19) 30(b)(6) witness(es)

Please let me know which witnesses you will produce without a subpoena, so that I can issue necessary subpoenas promptly. The blocks of time during which we wish to take the depositions, and the persons we desire during those blocks (in the order listed), are:

October 2-4 (we would need to conclude by 3:00 on the 4th):

Hattier
N. Bunting
Helms
Bireley
Mitchell
30(b)(6)

October 10-12 (we would need to conclude at 3:00 on the 11th):

Hobbs
Hastings
Evans
Hearn
Hughes
Isaacs

October 18-20 (Wilmington only) OR October 24-26
Cohee

McCabe
Walls
S. Bunting
Wilson
Oliphant
Gaffney

We have given further consideration to the issue of where the depositions should be taken. We will do the depositions in Georgetown, but only if:

1. You provide adequate space for 8 to 10 people, at no charge to the plaintiffs.
2. The witnesses are made available seriatim, without lengthy down time between depositions.
3. Our out of pocket travel expenses are reimbursed to us by the carrier or the District. We would expect that 2 lawyers will be present from our side. We would drive to Georgetown, stay at a Quality Inn-type hotel, and economize as much as reasonable, but we do not think that we should be penalized economically for accommodating your clients. Please let me know your position on this promptly.

We need to move quickly on the foregoing if we are to meet our deadlines.

Tom

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Further information about the firm, a list of the Partners and their professional qualifications will be provided upon request.

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